February 28, 2012

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

      Re: **FOIA Request for Confidential Treatment**

Dear Secretary:

Reval SDR, Inc. ("Reval SDR") hereby requests confidential treatment, pursuant to the Commodity Futures Tradition Commission (the "Commission") Regulation 145.9, for the documents listed on Schedule A hereto, submitted to the Commission in connection with Reval SDR's application for Registration as a Swap Data Repository (the "Application") pursuant to Section 21 of the Commodity Exchange Act ("CEA") and Part 49 of the Commission Regulations.

Pursuant to Commission Regulation 145.9(d)(5), Reval SDR requests that confidential treatment be maintained for the documents listed on Schedule A until further notice. We also request that the Commission notify the undersigned immediately after receiving any FOIA request for said documents or any other court order, subpoena or summons for same.

The basis for the request is that disclosure of these documents would reveal trade secrets or confidential commercial information or financial information of Reval SDR.

Pursuant to Commission Regulation 145.9(d)(3), the undersigned may be reached at Reval SDR, Inc., Attn: Patrick Trozzo, 420 Fifth Avenue, 5th Floor, New York, NY 10018 at (212) 901-7924.

Very truly yours,

Patrick Trozzo
President

Enclosures
cc: submissions@cftc.gov

Exhibit A – Ownership and Control with two attachments ("A-1 2nd Amended Cert of Inc.pdf" and "A-2 Amended 2nd Amended Cert of Inc.pdf")

Exhibit G - SDR Affiliates, Agreements & Parent Company Information Exhibit L – Material Pending Legal Proceeding(s)

Exhibit J – Rules

Exhibit L – Material Pending Legal Proceeding(s)

Exhibit N - Affiliate Financials

Exhibit O - Reval SDR, Inc. Fee Structure

Exhibit P -Material Contractual Arrangements

Exhibit Q - SDR Client Materials with 8 attachments ("Q1-Reval Connect Web Service Implementation v4 1.pdf", "Q2-Reval Connect Web Service Implementation for Trade Import v1.2.pdf", "Q3-Reval Connect Import Console Implementation v1.2.pdf", "Q4-Reval Fundamentals.pdf", "Q5-Reval Enhanced Reporting User Guide.pdf", "Q6-Reval Enhanced Reporting FAQ.pdf", "Q7-Reval Connect Web Service Implementation for Report Favorites v3.0.pdf", "Q8-Reval Connect Export Console Implementation v1.2.pdf"

Exhibit S - Services and Functions performed by Reval SDR

Exhibit T – Computer Hardware Utilized

Exhibit V – Reval SDR System Security Policies

Exhibit W – Reval SDR Emergency Polices and Procedures

Exhibit X - Back-Up Systems and Sub-Systems

Exhibit Y- SDR Capacity and Limitations

Exhibit Z – Access to SDR Data

Exhibit AA – Agreements for Sharing SDR Data

Exhibit BB - Limitations on using SDR Services

Exhibit CC - Specifications, Qualifications, or Other Criteria of SDR Participants

Exhibit DD - Limitations on Data Submission to the SDR

Exhibit EE - Policies and Procedures addressing Access Discrimination

Exhibit GG -Policy and Procedures for Data Privacy

Exhibit HH - Policies, Procedures & Safeguards for prevention of Misuse of Confidential Information

Exhibit II - Reval SDR, Inc. Use of Data for Commercial / Non-Commercial Purposes

Exhibit JJ - Policies and Procedures for Resolution of Disputes Regarding Accuracy of Swap Data and Positions Report to the SDR

Exhibit MM - Withdrawal from Registration